



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
WASHINGTON, D.C. 20460

OFFICE OF  
ENFORCEMENT AND  
COMPLIANCE ASSURANCE

September 20, 2021

Mr. Matthew Romanow  
Director, Engineering  
Innovative Hearth Products  
1502 14th Street NW  
Auburn, Washington 98001

Re: Montecito Estate CAT and WCT6904WS Catalytic Wood Heater Models; Certificate of Compliance Number 58-16

Dear Mr. Romanow:

The United States Environmental Protection Agency (EPA or Agency) is in receipt of your revised certification test report dated September 13, 2021, and your Certification of Conformity submitted to the Agency for the renewal of the above-referenced wood heater models' Certificate of Compliance. Our review of the revised certification test report has determined that Innovative Hearth Products (IHP) has sufficiently addressed the identified problems or irregularities documented below and in our September 8, 2021 and September 10, 2021 emails. Therefore, EPA has determined that IHP has submitted a valid certification test report in accordance with the 2015 Wood Heater Rule.

The 2015 Wood Heater Rule authorizes EPA to issue a Wood Heater Certificate of Compliance upon a manufacturer submitting all required documentation pertaining to a valid certification test. Such documentation must include a complete test report providing information for all test runs, including raw data sheets, laboratory technician notes, calculations, and test results. In addition, the documentation must include the items specified in the applicable test methods. *See* 40 C.F.R. § 60.533(b)(5).

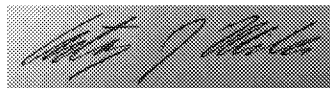
EPA issued a Certificate of Compliance for the above-referenced models dated September 16, 2016. As discussed below, EPA completed a post-certification review of the IHP certification test report, dated September 7, 2016 (revised on June 30, 2021). This review found the below problems or irregularities in the test report documentation.

Test Report Problems or Irregularities	Regulatory Citation	Information Submitted by Manufacturer to Address Problems or Irregularities
Compliance Determination Cannot be Made – Conditioning Data.	ASTM E3053, Section 8.1.4	Revised test report included documentation indicating that the conditioning run was conducted at a minimum of 50 hours at the <i>medium combustion air setting</i> using fuel with a moisture content of 18 -28% dry basis.
Missing Information – Fuel Data Sheet.	40 C.F.R. § 60.533(b)(5)	Revised test report included fuel information data (fuel crib length or dimensions and load density).

This letter documents the identified deficiencies and confirms they have been resolved based on additional information submitted by IHP to EPA. IHP must post the revised non-CBI test report on your website and provide to EPA the web address where it can be found. Your June 21, 2021, request for renewal will be acted upon accordingly. Given that the current Certificate of Compliance will expire on September 21, 2021, you (and your distributors and retailers) may not advertise, offer for sale, or sell wood heaters listed above after such date until you receive a renewal letter for the Certificate of Compliance by EPA.

This request has been coordinated with EPA's Office of Air Quality Planning and Standards and the Office of General Counsel. If you have any questions regarding this letter, please contact Rafael Sanchez of my staff at 202-564-7028 or via email at [WoodHeaterReports@epa.gov](mailto:WoodHeaterReports@epa.gov).

Sincerely,



Digitally signed by ANTHONY MILLER  
Date: 2021.09.20 14:16:05 -06'00'

Anthony J. Miller  
Acting Director  
Monitoring, Assistance, and Media Programs Division  
Office of Compliance  
Office of Enforcement and Compliance Assurance

cc:

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